

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PAUL DAVIS,)	
)	
Plaintiff,)	
)	Civil Action No. 04-11851-WGY
v.)	
)	
SUFFOLK COUNTY AND)	
ANDREA CABRAL)	
(in her official capacity))	
)	
Defendants.)	

**MOTION TO EXTEND THE DEADLINES PURSUANT TO THE JOINT DISCOVERY
PLAN FILED UNDER FED. R. CIV. P. 16(b) AND L.R. 16.1**

Now comes plaintiff, PAUL DAVIS, in the above-captioned matter and moves this Honorable Court to extend the time frames set forth by the parties in the Joint Discovery Plan filed January 26, 2005¹. The requested extension, if allowed, would provide as follows:

1. All depositions of fact witnesses completed by or before September 15, 2005;
2. Disclosures of experts for plaintiff by July 15, 2005 and for defendant by August 12, 2005.
3. Dispositive motions filed with the Court by or before October 14, 2005;
4. Trial by jury — November 2005.

As grounds therefor, plaintiff states as follows:

¹ Plaintiff is not requesting that the deadline set for disclosure of experts be enlarged, nor is plaintiff asking to postpone the trial date.

1. Counsel for plaintiff has been occupied with several criminal matters in the United States District Court, and several dates have been reserved for motion hearings before Hon. Nancy Gertner in the matter of United States v. Green, et al., (02-10301 NG). Trial of this case is currently scheduled to begin September 19, 2005.
2. Additional time is needed to schedule depositions, which will then require allowing additional time for preparation and filing of dispositive motions.

Respectfully submitted,

PAUL DAVIS

By his attorneys,

/s Christie M. Charles

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Dated: July 8, 2005